

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

MELISSA SAGER

Plaintiff,

v.

HOUSING COMMISSION OF ANNE
ARUNDEL COUNTY, *et al.*

Defendants.

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Civil Action No. SKG -11-02631

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MOTION TO REOPEN ACTION FOR GOOD CAUSE

COMES NOW the Plaintiff, Melissa Sager, by and through her counsel Kathleen M. Hughes, Esq., Lisa M. Sarro, Esq. and the Maryland Legal Aid Bureau and respectfully requests that this Court reopen the above captioned action and extend the Local Rule 111 Settlement Order for a period of 30 days. In support of this Motion the Plaintiff states as follows:

1. On November 6, 2013, the parties engaged in a settlement conference facilitated by the Hon. Judge Stephanie Gallagher in which the terms of a Settlement Agreement were outlined.
2. This Court issued its Local Rule 111 Settlement Order on the same date providing that the parties maintained the right to move for good cause within 30 days to reopen this action if settlement is not consummated.
3. 30 days expires on Friday December 6, 2013.
4. Despite the parties' good faith efforts to complete the Agreement on or before December 6, the Agreement has not yet been finalized or executed.
5. The parties have some minor details and challenges which are being worked through and fully expect to have an Agreement finalized within the next few business days.

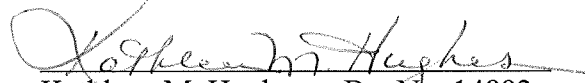
6. Counsel for the Defendants has expressed concern that once the Agreement is finalized, there may be a slight delay in obtaining the signature of one of the named defendants in that she is no longer employed by the Housing Commission of Anne Arundel County.

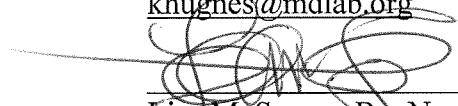
7. Counsel for the Defendants, Carrie Blackburn Riley, Esq., has been consulted and consents to the reopening of this action for the purpose of finalizing the Settlement Agreement.

WHEREFORE, the Plaintiff, Melissa Sager respectfully requests that this Court

- a. Reopen this action to allow the parties additional time to finalize the Settlement Agreement;
- and
- b. Extend the Local Rule 111 Settlement Order for a period of 30 days; and
- c. For such other and further relief as the nature of this cause may require.

Respectfully submitted,


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